

Whistleblowing Policy



Contents

- 1. Introduction
- 2. Scope
- 3. Policy
 - a. Definition
 - b. Protection for whistleblowing
 - c. Blowing the whistle
 - d. Investigation Procedure
- 4. Related documents / Appendices



1. Introduction

Whistleblowing is the term used when an employee passes on information about wrongdoing. Employees are expected to adopt a proactive attitude, avoiding passive tolerance to wrongdoing. This policy links closely to the principles of the S&P code of conduct.

2. Scope

This policy applies to all employees of Envirovent, as well as customers, suppliers and third parties interacting with our company.

3. Policy

a. Definition

Whistleblowing is the term used when an individual passes on information about wrongdoing. If an individual concerned that any of the things below are happening, have happened or are likely to happen, Envirovent encourage you to raise this as soon as possible:

- Any bribery, fraud or other criminal offence has been or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with a legal obligation.
- A miscarriage of justice has happened, is happening or is likely to happen.
- The health and safety of an individual has been, is being or is likely to be damaged.
- Damage to the environment has occurred, is occurring or is likely to occur.
- Information showing any of the above has been, is being, or is likely to be deliberately concealed.

An individual doesn't need to have any proof that any of these things are happening. As long as they have a reasonable belief, they should report their concerns. But if the company find that the individual has knowingly made a false allegation, the company may deal with this under the Disciplinary procedure.

Remember, if an individual has got a personal complaint or concern, like about how their being treated at work, this isn't a whistleblowing matter. It would be covered under the Grievance Procedure.

Whistleblowing is usually a concern about a wrongdoing that affects the company more widely.

b. Protection for whistleblowing

If an individual has reported a reasonable belief of whistleblowing, Envirovent won't allow that person to be treated badly because of it. If an employee is treated badly because of whistleblowing, the company may investigate and it could mean disciplinary action against that person. They might also be at risk of being found personally liable for their behaviour.



c. Blowing the whistle

The Company wishes to ensure that any such wrongdoings are reported and dealt with. If an employee become aware of a wrongdoing at work, then follow the procedure below immediately.

If an employee needs to raise a concern, they can raise the issue with their line manager. But if the whistle-blower’s line manager is involved in the activity, they have concerns about, or don’t feel able to speak to them, talk to another manager or the People Team instead.

Matters can be either raised in person, or written. The letter needs to include; what the concern is, why they think it’s true and any other details they can provide. The company may need to get in touch with the individual to talk about the concerns or to get some more details, so please include contact details.

Concerns can be raised anonymously, and these will be taken seriously. But it may be difficult for the company to do a proper investigation if they can’t talk about other information they might need.

If the whistle-blower is not satisfied that disclosure has been dealt with properly or believes that their line manager or any of the Company’s managers are involved in the wrongdoing, raise the concerns directly with the People Team or the Managing Director.

Violations can also be reported to our independent whistleblowing channel held by S&P: <https://www.solerpalau.com/en-en/whistleblowing-channel/>

It is an anonymous channel, only S&P Group’s Compliance Committee have access; depending on the nature of the allegation it may be then sent to Envirovent for investigation. Customers, suppliers and other third parties can also whistleblowing via this reporting channel.

d. Investigation Procedure

Once it’s clear that it’s whistleblowing, it’s important that it’s investigated as quickly as possible, while making sure things are looked in to thoroughly. It should only be investigated by someone who is independent to the issue raised, if the complaint involves the investigator, it should be passed to another manager to deal with.

A whistleblower must not be treated differently because they have spoken up.

If the allegations were made anonymously, a thorough investigation should be carried out but no attempts should be made to try and identify the whistleblower.

If the complaint was not anonymous the investigator must not reveal the whistle-blowers’ identity without the individual’s consent. The investigation may mean the investigator needs to contact the whistle-blower to get more information, at this point the investigator will ask if the whistle-blower wishes for their identify to be kept confidential. The investigator at this point should also reassure them that they won’t be treated any differently at work for speaking up.



The investigator should keep the whistleblower informed if the investigation is taking longer than originally thought, so they know it's still ongoing and hasn't been forgotten.

The findings of the investigation will be reported to the Managing Director, who will take any necessary action including, if appropriate, reporting the matter to the relevant external authority. Where, as a result of the disclosure, it is necessary to take disciplinary action against an employee, this will be done in accordance with the Company's formal disciplinary procedure.

Inform the individual who identified the wrongdoing of the outcome of the investigation and any actions taken as a result.

4. Related Documents / Appendices

S&P Code of Conduct

Sexual Harassment Policy

Equal Opportunities and Dignity at Work policy

Disciplinary Policy

Grievance Policy

Signed by:



Andrew Makin
Managing Director
Date: 01/11/2024

